



MONTANA
TELECOMMUNICATIONS
ASSOCIATION

May 23, 2007

The Honorable Kevin J. Martin
Chairman
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

RE: CC Docket No. 01-92; Inter-carrier Compensation

Dear Chairman Martin,

On behalf of the Montana Telecommunications Association (“MTA”), I applaud your recent, stern warning to America’s largest long distance companies that under no circumstances should they engage in self-help tactics by unilaterally blocking telecommunications traffic. For years, rural telcos have been terminating “phantom traffic” calls for which they receive no compensation. Instead of unilaterally blocking “phantom traffic” calls, rural telcos, like MTA’s member companies, are committed to complying with Commission rules and working with the Commission to resolve the issue.

MTA is also committed to working with the Commission to resolve the out-dated intercarrier compensation regime. As demonstrated by the dispute between America’s largest long distance carriers and a group of rural telcos in Iowa and Minnesota that offer free conference calling services, the existing intercarrier compensation system is prone to arbitrage. MTA’s member companies do not currently engage in, nor do they plan to engage in, the free conference calling scheme in which the Iowa and Minnesota companies are participating. Continued arbitrage of the intercarrier compensation regime by any party is not constructive.

Once again, thank you for taking steps to ensure the continuity of America’s telecommunications network is not adversely affected by disputes between carriers. We look forward to continuing to work with you on intercarrier compensation reform.

Sincerely,

Geoff Feiss, General Manager
Montana Telecommunications Association

cc: Thomas Navin, Chief – Wireline Competition Bureau